

# EXHIBIT D

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**Subject:** 12/15 - Weekly Call re OEM Discovery Reminder

**From:** [owner-oem\\_subpoenas@lists.susmangodfrey.com](mailto:owner-oem_subpoenas@lists.susmangodfrey.com) [[mailto:owner-oem\\_subpoenas@lists.susmangodfrey.com](mailto:owner-oem_subpoenas@lists.susmangodfrey.com)] **On**  
**Behalf Of** Ronnie Spiegel  
**Sent:** Thursday, December 14, 2017 5:58 PM  
**To:** [OEM\\_subpoenas@lists.susmangodfrey.com](mailto:OEM_subpoenas@lists.susmangodfrey.com)  
**Subject:** 12/15 - Weekly Call re OEM Discovery Reminder

Counsel,

This is a reminder for our weekly call tomorrow at 9 am Pacific re OEM discovery. I am re-circulating the chart below to help move the discussion along. Here is the call-in:

1-888-887-4221

8330000

Best,  
Ronnie

Ronnie Spiegel | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9343

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**From:** Ronnie Spiegel  
**Sent:** Friday, December 8, 2017 10:03 AM  
**To:** 'OEM\_subpoenas@lists.susmangodfrey.com' <[OEM\\_subpoenas@lists.susmangodfrey.com](mailto:OEM_subpoenas@lists.susmangodfrey.com)>  
**Cc:** 'eehrenfeld@SusmanGodfrey.com' <[eehrenfeld@SusmanGodfrey.com](mailto:eehrenfeld@SusmanGodfrey.com)>; 'Lucas Issacharoff' <[Lissacharoff@susmangodfrey.com](mailto:Lissacharoff@susmangodfrey.com)>  
**Subject:** Follow Up Email from 12/8 Weekly Call re OEM Discovery

As we discussed on today's call, please provide the following information:

- 1) Please email Ronnie (and cc Elizabeth Ehrenfeld at [eehrenfeld@susmangodfrey.com](mailto:eehrenfeld@susmangodfrey.com)) with the names of the people from your firm/party that should be included in the listserv. Please provide the first name, last name, and email for each person to be included. If you are defense counsel, please also identify your defendant. If anyone is receiving emails from this listserv and wants to be taken off of the list completely, please contact Elizabeth Ehrenfeld to be removed from the list.
- 2) Defendants, please identify who will be the liaison for your overall defense group.
- 3) Defendants (collectively) and each plaintiff group, please send an email to the listserv confirming the cost agreement.
  - a. For costs related to 30b6 (and follow up questions), the parties agree to split the ordered 60% between Plaintiffs (30%) and Defendants (30%), with each of the two groups to work out their own internal allocation and specifics for their respective 30%.
  - b. For costs related to production, the parties agree to split the ordered 70% between Plaintiffs (35%) and Defendants (35%), with each of the two groups to work out their own internal allocation and specifics for their respective 35%.
- 4) All, please look at the list below and send Ronnie an email identifying the point people for your group to be listed on the chart. Please include emails for each person so that we can create a quick contact list.

Kind regards,  
Ronnie

OEM or Task	EPP Point Person	Def Point Person	ADP Point Person	TEDP Point Person
Costs Point Person  *Master of Costs – one central person to represent all parties to collect, keep, and track all bills and payments.				
FCA Production				
GM Production				
Honda Production				
Nissan Production				
Subaru (SIA) Production				
Subaru (SOA) Production				
Toyota Production				
Ford Production				
Mazda Production				
Suzuki Production				
Isuzu Production				
Daimler Production				
Mitsubishi Production				
Hyundai/Kia Production				
BMW Production				
Jaguar Land Rover				
Volkswagen Production				
Volvo Production				

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